

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

BRENDA FORMAN,	:	
	Plaintiff :	No. 2:24-CV-00266
	:	
v.	:	Judge Ranjan
	:	
AL SCHMIDT,	:	Electronically Filed Document
	Defendant :	

**DEFENDANT’S MOTION TO WITHDRAW WAIVER OF
SERVICE**

AND NOW, comes the defendant, Secretary of the Commonwealth Al Schmidt, by their attorneys, Meghan A. Flowers, Deputy Attorney General, and Karen Romano, Chief Deputy Attorney General, Civil Litigation Section, and respectfully moves this Court to dismiss the Complaint upon the following grounds:

1. Plaintiff, Brenda Forman (“Plaintiff”), is a *pro se* Plaintiff and initiated the instant matter by filing a Complaint on March 4, 2024.
2. Undersigned counsel entered their appearance in this case on March 27, 2024 and simultaneously filed a Waiver of Service. [ECF 3 and ECF 4].
3. Undersigned counsel has confirmed that Defendant Schmidt was served with the complaint on March 12th and a responsive pleading shall be filed on or before April 2, 2024.
4. The Defendant now moves to withdraw the Waiver of Service.

WHEREFORE, the Defendant respectfully requests that the instant motion be granted and that the Waiver of Service is withdrawn.

Respectfully submitted,

MICHELLE A. HENRY
Attorney General

Office of Attorney General
1251 Waterfront Place
Mezzanine Level
Pittsburgh, PA 15222
Phone: (412) 565-3017
mflowers@attorneygeneral.gov

Date: March 28, 2024

By: s/ Meghan A. Flowers
MEGHAN A. FLOWERS
Deputy Attorney General
Attorney ID 326721

Karen Romano
Chief Deputy Attorney General
Civil Litigation Section

Counsel for Defendant Al Schmidt

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

BRENDA FORMAN,	:	
	Plaintiff :	No. 2:24-CV-00266
	:	
v.	:	Judge Ranjan
	:	
AL SCHMIDT,	:	Electronically Filed Document
	Defendant :	

CERTIFICATE OF SERVICE

I, Meghan A. Flowers, Deputy Attorney General for the Commonwealth of Pennsylvania, Office of Attorney General, hereby certify that on March 28, 2024, I caused to be served a true and correct copy of the foregoing document titled DEFENDANT’S MOTION TO WITHDRAW WAIVER OF SERVICE to the following:

VIA U.S. MAIL

Brenda Forman
5301 5th Avenue #9
Pittsburgh, PA 15232
Pro Se Plaintiff

s/ Meghan A. Flowers
MEGHAN A. FLOWERS
Deputy Attorney General